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November 6, 2007

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte*, Petitions of the Verizon Telephone Companies for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Boston, New York, Philadelphia, Pittsburgh, Providence and Virginia Beach Metropolitan Statistical Areas, WC Docket No. 06-172

Dear Ms. Dortch:

In an October 31, 2007 *ex parte* letter,¹ Verizon's outside counsel submitted a proposed "conversion" of data submitted by Time Warner Cable ("Time Warner") regarding the number of customers and locations Time Warner serves in the New York metropolitan statistical area ("MSA").² Time Warner submitted data for its enterprise customer and locations arranged by zip code, and its residential customers by rate center.

Because Time Warner's data was submitted by zip code and rate center, the data does not identify the number of Time Warner subscribers, or of end user locations that Time Warner is ready and able to serve, within a specific Verizon wire center. Verizon's counsel suggested a method for allocating Time Warner's data to Verizon wire centers. This turns out, however, to be exactly the same methodology previously used by Verizon to allocate CLEC E911 phone number data to wire centers – a formula already proven to be so inaccurate as to be useless.

For CLEC E911 data, Verizon "proportionally assign[ed] [CLEC] E911 listings to each of the possible wire centers with which the E911 listing can be associated."³ Verizon stated that, where a particular rate center is associated with more than one

¹ See letter from Evan T. Leo, Counsel to Verizon, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 06-172 (filed Oct. 31, 2007) ("Verizon Oct. 31 *Ex Parte* Letter").

² *Id.* at 1.

³ Reply Comments of Verizon, WC Docket No. 06-172, at Exhibit 1 (filed Apr. 18, 2007).

Verizon wire center CLLI, “the [E911] listings are assigned proportionately to each of these Verizon CLLIs based on the relative number of Verizon’s residential or business lines (Retail + Resale + Wholesale Advantage) in each of these wire centers. Proportions are calculated separately for residential and business data.”⁴ Likewise, in its conversion of Time Warner’s data, Verizon proportionally assigned Time Warner’s business cable customer data “to each Verizon CLLI in the zip code based on the relative number of Verizon’s business lines (Verizon Retail Lines + Resale + Wholesale Advantage) in each wire center.”⁵ For residential data, which Time Warner compiled based on rate centers, Verizon’s counsel performed a similar allocation based on the relative number of Verizon’s residential lines in each wire center.⁶ Thus, except for the fact that Time Warner’s business data is presented by Zip Code rather than rate center, the allocation methods are precisely identical.

This is also exactly the same methodology used by Verizon to allocate E911 listing data to wire centers in its ongoing Virginia pricing flexibility proceeding. Testimony in that Virginia case has exposed, **and Verizon has admitted**, serious errors in the allocation methodology.⁷ Specifically, in testimony filed in Virginia State Corporation Commission (“VSCC”) Case No. PUC-2007-00008, Chris Harris, Senior Telecommunications Specialist in the Division of Communications of the VSCC expressed his “concerns with the process used by Verizon to assign the CLEC E911 listings to its wire centers”⁸ and found “very significant differences in the CLEC line estimates used by Verizon ... and the CLEC line count reported to the Staff. Therefore, relying on Verizon’s data would likely result in overstating the CLEC’s market shares in various wire centers.”⁹ Kathleen Cummings, Deputy Director-Rates and Costs with the Division of Communications added, “our real concern is whether we can use Verizon’s assignment process for CLEC lines at the wire center level. At this point, we are not

⁴ *Ex parte* letter from Joseph Jackson, Verizon, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 06-172, June 13, 2007, Attachment A at 3. The full allocation methodology is explained in detail in this document.

⁵ *See* Verizon Oct. 31 *Ex Parte* Letter at 2.

⁶ *Id.* at 3.

⁷ *See, e.g.*, Declaration of Joseph Gillan on Behalf of Broadview Networks *et al.*, WC Docket No. 06-172, at 4-8 (March 2, 2007) (*filed as an attachment to* Comments of Broadview Networks *et al.*, WC Docket No. 06-172 (filed March 5, 2007).

⁸ Virginia State Corporation Commission, Division of Communications, Pre-Filed Direct Testimony of Chris Harris, PUC-2007-00008, at ¶ A.10 (June 27, 2007) (copy attached hereto as Exhibit 1). Mr. Harris describes the Verizon allocation methodology as used in Virginia in detail at pages 4-9 of his testimony.

⁹ *Id.* at ¶ A.6.

convinced that doing so will necessarily produce accurate results.”¹⁰ Also in that proceeding, Joseph Gillan, an economist with a consulting practice that specializes in telecommunications found Verizon’s allocation methodology to be faulty and that “Verizon’s manipulation of that database by allocating CLEC listings to wire centers ... mak[es] it impossible to make sound recommendations ... on this record.”¹¹

Most significantly, in a discovery response submitted to the Virginia SCC staff in the same proceeding, Verizon admitted that it was not relying in that case upon proportional allocations of CLEC lines to wire centers based on the Verizon line ratio, “*because the allocations may not be reliable at the Wire Center level.*”¹² However, Verizon is relying upon precisely the same unreliable allocations in this proceeding, not only with respect to the Time Warner Cable data, but also in Exhibits 1 and 3 to its Reply Comments.

The Commission’s previous UNE forbearance decisions make it clear that one (although not the only) critical factor in the analysis of Verizon’s petitions must be the ability of competitors to serve end users *entirely over their own facilities* within a particular wire center.¹³ The data submitted by Time Warner, however, does not show the extent of its facilities coverage within *any* wire center, and Verizon’s proposed conversion methodology is too flawed to be used for this purpose. The Commission therefore cannot rely upon the Time Warner data to reach any conclusions regarding facilities-based competition at the individual wire center level.

¹⁰ Virginia State Corporation Commission, Division of Communications, Pre-Filed Direct Testimony of Kathleen Cummings, PUC-2007-00008, at ¶ A.39 (June 27, 2007).

¹¹ Pre-Filed Direct Testimony of Joseph Gillan on behalf of Cox Virginia Telecom, Inc., Case No. PUC-2007-00008, at 5 (June 1, 2007).

¹² Verizon discovery response OAG 158.1, quoted in Testimony of Chris Harris, Case No. PUC-2007-00008, at ¶ A.17.

¹³ *Petition of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Omaha Metropolitan Statistical Area*, Memorandum Opinion and Order, 20 FCC Rcd 19415 at ¶ 69 n.156 (2005), *aff’d Qwest Corporation v. Federal Communications Commission*, Case No. 05-1450, (D.C. Cir. Mar. 23, 2007); *Petition of ACS of Anchorage, Inc. Pursuant to Section 10 of the Communications Act of 1934, As Amended, for Forbearance From Sections 251 (c)(3) and 252(d)(1) in the Anchorage Study Area*, Memorandum Opinion and Order, 22 FCC Rcd 1958, at 21 (2007).

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Respectfully submitted,

/s/ Russell M. Blau

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EXHIBIT 1

PRE-FILED TESTIMONY

OF

CHRIS HARRIS

VERIZON VIRGINIA INC. AND VERIZON SOUTH INC.

CASE NO. PUC-2007-00008

Q1. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A1. My name is Chris Harris and my business address is 1300 East Main Street, Richmond, Virginia.

Q2. WHAT IS YOUR POSITION WITH THE COMMISSION?

A2. I am a Senior Telecommunications Specialist in the Division of Communications.

Q3. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A3. The purpose of my testimony is to describe the Staff's efforts to develop a database with market share information for Competitive Local Exchange Carriers ("CLECs") and Verizon for this proceeding. In addition, I discuss concerns with Verizon's use of the E911 database to derive CLEC lines and particularly the process of assigning those lines to Verizon Virginia's and Verizon South's wire centers.

Q4. WHY WAS IT NECESSARY TO DEVELOP A DATABASE TO DETERMINE THE CLEC'S AND VERIZON'S MARKET SHARE?

A4. Staff's witness, Dr. Ben Johnson, describes the importance of market share data in analyzing the competitiveness of geographic areas in his testimony. The database was

developed to provide Dr. Johnson with the most reliable data the Staff has available at this time.

Q5. DID VERIZON INCLUDE MARKET SHARE INFORMATION IN ITS TESTIMONY?

A5. Yes. Verizon's Exhibit 15 provides market share data for each Verizon wire center in each Virginia Metropolitan Statistical Area ("MSA") and Region. Exhibit 15 compares total CLEC lines on both a business and residential basis to Verizon's lines in each Verizon wire center to produce a wire center by wire center market share percentage for Verizon. Exhibit 15 also shows the CLEC lines further broken down into Resale, Wholesale Advantage, and E-911 categories.

Q6. WHY DIDN'T DR. JOHNSON USE THE MARKET SHARE INFORMATION IN EXHIBIT 15 FOR HIS ANALYZES?

A6. As Ms. Cummings states in her testimony, there are very significant differences in the CLEC line estimates used by Verizon in Exhibit 15 and the CLEC line count reported to the Staff. Therefore, relying on Verizon's data would likely result in overstating the CLECs' market shares in various wire centers.

Q7. PLEASE EXPLAIN THE STAFF'S INITIAL DECISION IN DEVELOPING ITS MARKET SHARE DATABASE?

A7. Unfortunately, we were unable to determine the geographic distribution of CLEC lines reported to the Staff because they are not provided on a wire center or other granular geographic basis. Therefore, we determined that the best approach was to start with

Verizon's data used in its Exhibit 15 to create a database that could be logically expanded to include the CLEC lines reported to the Staff.

Q8. WHAT WAS THE FIRST STEP IN CREATING THIS DATABASE?

A8. The first step was to replicate Verizon's Exhibit 15 data sources. We obtained Verizon's data from responses to several Staff interrogatories. This effort took considerable time because Verizon's supporting data was provided in several different formats. The data had to be restructured to a database format.

Q9. WHAT WAS THE NEXT STEP?

A9. Once replicating Verizon's results was completed, the next step was to incorporate the reported CLEC lines into the database. As previously mentioned, the CLEC-reported information is not geographically disaggregated but lines are reported separately for both residential and business services and by category. Those line categories are Resale, UNE-P (i.e. Verizon's Wholesale Advantage Service), UNE-loop, and facilities-based. It was necessary to develop company specific factors to adjust the Verizon CLEC line estimates to the level reported to the Staff by each CLEC for the service types (i.e. business or residential) and category. These factors were then applied to Verizon's CLEC wire center data for business and residence by category in order to in effect spread the CLEC lines reported to the Staff to Verizon's wire centers in the same manner as Verizon did in Exhibit 15. Factors were also used to adjust Verizon's retail line counts to the levels reported to the Staff.

Q10. ARE THERE CONCERNS WITH ALLOCATING THE CLEC LINES ON THE BASIS OF VERIZON'S DISTRIBUTION TO WIRE CENTERS?

A10. Yes. As discussed by Ms. Cummings, our initial concern was with Verizon's estimates of the number of CLEC lines, particularly those derived from the E911 database. We have attempted to overcome this problem by using the lines reported by Verizon and the CLECs in their semi-annual filings with the Staff. However, we also have concerns with the process used by Verizon to assign the CLEC E911 listings to its wire centers.

Q11. HOW DID THE STAFF DETERMINE VERIZON'S PROCESS FOR ASSIGNING CLEC E911 LISTINGS TO ITS WIRE CENTERS?

A11. The process used by Verizon to assign CLEC E911 listings to its wire centers is described in Confidential Attachment OAG 158.1. This document is attached to my testimony in Exhibit CH-1. This attachment describes the processes for identifying the E911 listings associated with CLECs and categorizing those listings as residential or business as well as assigning the CLEC E911 listings to a Verizon wire center. According to Confidential Attachment OAG 158.1, the E911 data is generated by Verizon's IT group and a file is sent to Verizon's **(Begin Confidential)** XXXXXX **(End Confidential)** group on a monthly basis and is used for "competitive analysis purposes." The data sent to Verizon's **(Begin Confidential)** XXXXXXXX **(End Confidential)** group includes the following fields: NPA/NXX, Class of Service, CLEC name, and Listing Count.

Q12. PLEASE EXPLAIN THE STAFF'S UNDERSTANDING OF THE PROCESS VERIZON USED TO ASSIGN THE CLEC E911 LISTINGS TO ITS WIRE CENTERS.

A12. Verizon uses a multi-step process to assign the CLEC E911 listings to its wire centers. The first step involves using the Local Exchange Routing Guide ("LERG") to associate the NPA/NXX of the CLEC E911 listings to the first eight digits of the corresponding CLEC's Common Language Location Identification ("CLLI") code.

Q13. WHAT IS AN NPA/NXX?

A13. The term NPA/NXX refers to the first six numbers of a ten digit telephone number. Each NPA/NXX has 10,000 phone numbers which are assigned to a specific exchange (or Rate Center; the terms are interchangeable in the context of my testimony). The telephone numbers in exchanges are connected to switches located in central offices (or wire centers; the terms are interchangeable in the context of my testimony). Each central office switch is identified by a unique CLLI.

Q14. WHAT IS A CLLI?

A14. A CLLI is a unique 11 digit code used as a tool to help identify and shorten the description for routing traffic from and to customer lines on or through the Public Switched Telephone Network. In the context of my testimony, however, it refers to a switch or group of switches when only the first eight characters of the CLLI are utilized.

Q15. PLEASE DESCRIBE IN MORE DETAIL THE FIRST STEP OF THE VERIZON PROCESS USED TO ASSIGN THE CLEC E911 LISTINGS TO ITS WIRE CENTERS.

A15. According to Confidential Attachment OAG 158.1, there are three scenarios once the CLLI is identified and shortened. First, as described in Step IA, if the 8-digit CLEC CLLI code is associated with a Verizon 8-digit CLLI code, Verizon assigns all those listings to that single wire center. Second, as described in Step IB, if the 8-digit CLEC CLLI corresponds to multiple Verizon CLLIs, Verizon assigns the lines on a proportional basis to each of its CLLIs based on the wire center's share of Verizon's retail, resale, and Wholesale Advantage lines in the multiple Verizon CLLI grouping. Third, Step IC establishes a different process if the CLEC's 8-digit CLLI does not correspond to any Verizon CLLI. If this occurs, the assignment is to a Verizon Rate Center and an additional step comes into play.

Q16. WHAT IS THIS NEXT STEP?

A16. Step II uses the LERG to identify the Verizon CLLIs associated with each Rate Center. Step IIA states that if only one Verizon CLLI is associated with a Rate Center for the NPA/NXX, the CLEC listings are assigned to that Verizon wire center. Step IIB addresses when there is more than one Verizon wire center associated with the Rate Center for the NPA/NXX. Step IIB proportionally assigns the CLEC listings to individual Verizon CLLIs as described in Step IB above. Lastly, if there is no Verizon wire center associated with the rate center for the NPA/NXX, the listings are assigned to an "Unknown" CLLI and are presumably omitted from Verizon's analysis.

Q17. HAS VERIZON USED ALL THE STEPS IDENTIFIED IN CONFIDENTIAL ATTACHMENT OAG 158.1 TO ASSIGN THE CLEC E911 LISTINGS IN ITS EXHIBIT 15 RESULTS?

A17. Apparently not. As discussed above, Steps IB and IIB provide for a proportional assignment of the CLEC listings under certain circumstances. However, Confidential Attachment OAG 158.1 states in Example 2 (on page 5) and Example 4 (on page 6) that because both of these steps involve allocations, the E911 listings are labeled as "Not Directly Assignable" and are "only reported at the MSA level because the allocations may not be reliable at the Wire Center level."

Q18. DO YOU HAVE CONCERNS ABOUT VERIZON'S ASSIGNMENT PROCESS?

A18. Yes. Our initial concern arises from the first step in Verizon's assignment process that is using the 8-digit CLEC CLLI and directly correlating that with a Verizon CLLI that has the same first 8-digits. In fact, a switch is identified by an eleven character CLLI code instead of eight characters. The first eight digits of a CLEC CLLI gives a general geographic location for the CLEC's switch but it does not fully define the geographic area the switch may serve, nor does it necessarily correspond to exactly the same geographic area served by a Verizon wire center with the same first 8-digits.

Assigning CLEC lines based on the 8-digit CLLI may be a problem particularly when the NPA/NXX used to identify the CLLI is assigned to the CLEC and not to Verizon. The Verizon process of associating a CLEC-assigned NPA/NXX to an 8 digit CLLI does not consider whether that CLEC NPA/NXX serves exclusively in the same geographic area as Verizon's "associated" wire center or if the CLEC NPA/NXX is

actually working in another Verizon wire center or exchange area. For example; based upon NANPA NPA-NXX assignment data, Level 3 provides service in a number of exchanges with an NPA/NXX assigned to each from its switch located in Lynchburg, Virginia. Therefore, Level 3 has several NPA/NXXs assigned to its switch in Lynchburg and the first 8 digits of the CLLI for that Level 3 switch happen to match the first 8 digits of a Verizon switch's CLLI in Lynchburg. Thus all of the Level 3 lines from all other exchanges working on the Level 3 switch in Lynchburg would be associated **(Begin Confidential) XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX End Confidential)** pursuant to Verizon's assignment process.

Nor does the Verizon process consider porting a number between wire centers in a Rate Center. For example; suppose a customer obtained their number from Verizon out of the Grace Street wire center in the Richmond exchange and later ported the number to a CLEC such as Cavalier and then moved to the west end of Richmond. The customer would then be served out of Cavalier's collocation space in Verizon's Pemberton wire center (also in the Richmond exchange); however, the E911 data for Cavalier would show the line associated with Verizon's Grace Street wire center.

Q19. WHAT CAN HAPPEN IF THE NPA/NXX ASSOCIATED WITH THE CLEC'S CLLI IS USED TO SERVE A DIFFERENT GEOGRAPHIC AREA THAN VERIZON'S CLLI?

A19. It may overstate the number of lines served by a CLEC in that Verizon wire center.

Q20. WHAT OTHER CONCERNS ARE THERE WITH VERIZON'S PROCESS TO ASSIGN CLEC LISTINGS TO ITS WIRE CENTERS?

A20. Verizon designates a very significant share of the CLEC E911 listings as "Not Directly Assignable" to a wire center and therefore those lines are only identified at the MSA or Region level. Highly Confidential Exhibit CH-2 is a table that shows the number and percentage of the "Not Directly Assignable" lines for Verizon's CLEC line estimates and the corresponding CLEC lines reported to the Staff for each MSA and Region. Verizon's analysis has nearly **(Begin Highly Confidential) XXX (End Highly Confidential)** of the business lines and just under **(Begin Highly Confidential) XXXXXXXX (End Highly Confidential)** of the residential lines designated as "Not Directly Assignable." Because the Staff relied on Verizon's assignment process, we also have a very large percentage of lines in the "Not Directly Assignable" category.

Q21. COULD VERIZON HAVE ASSIGNED THE "NOT DIRECTLY ASSIGNABLE" LINES TO A SMALLER GEOGRAPHIC AREA THAN A MSA?

A21. Yes. We agree with Verizon that the process described in Confidential Attachment OAG 158.1 (in Steps IB and IIB) to assign CLEC lines to a Verizon wire center would produce unreliable results. However, Verizon could have gone at least one step further by using the NPA/NXX to determine at least the Rate Center (a much smaller geographic area than a MSA) location of those E911 listings.

Q22. DO YOU HAVE A SUGGESTION FOR A BETTER PROCESS TO ASSIGN THE E911 LISTINGS?

A22. Dr. Johnson addresses the type of information the Staff would need to identify the location of CLEC lines properly. However, with respect to Verizon's E911 database, it would have been preferable to have the CLEC E911 listings associated with a Rate

Center as the first step instead of assigning to a CLLI. According to publicly available information from NeuStar, 185 of Verizon's Rate Centers are served by a single wire center and only 43 are served by more than one wire center. Therefore, many CLEC E911 listings could still have been assigned to a Verizon wire center but with more reliability. Further analysis to refine the data for the other 43 wire centers would still be necessary; however we would at least have all the CLEC E911 listings assigned to the correct Rate Center.

Q23. CAN THE STAFF MAKE THESE CHANGES IN ITS DATABASE?

A23. No. The Staff database is based upon Verizon's assignment of CLEC lines to its wire centers and we do not currently have the capability to reassign the CLEC E911 lines on a Rate Center basis.

Q24. IS THERE A CONCERN WITH THE DATA FOR CERTAIN VERIZON WIRE CENTERS?

A24. Yes. Verizon did not include the Crows-Hematite wire center/exchange at all. In response to a Staff interrogatory, Verizon claims that Crows-Hematite wire center/exchange was omitted because it shares the same CLLI with a wire center in White Sulphur Springs, West Virginia, and only has an insignificant number of lines (less than 300).

In addition, Verizon consolidated its Cartersville, Cumberland, and Fife wire centers/exchanges with its Powhatan wire center in the Richmond MSA. According to Verizon, these wire centers are all remote switches hosted off of its Powhatan switch.

This may not be a major problem at this time. However, it highlights the need for more precise data as Dr. Johnson discusses.

Q25. DID YOU FIND OTHER PROBLEMS WITH VERIZON'S CLEC E911 LISTINGS?

A25. Yes. There isn't consistency in the types of lines being included in the overall analysis. For example, the Verizon CLEC E-911 listings include CLEC official and Customer Owned Coin Operated Telephone lines which Verizon did not include in its own retail line counts. Official lines are a company's own lines used to conduct business.

Q26. ARE THERE OTHER PROBLEMS WITH VERIZON'S DATA USED IN THE STAFF DATABASE?

A26. I have found a few further issues with Verizon's data, but the overall effect of these appears to be minimal. For example, there are some negative entries and fractional line quantities associated with some of the CLEC line data.

Q27. DID THE STAFF MAKE ANY OTHER MODIFICATIONS TO VERIZON'S LINE COUNTS?

A27. Yes. As Ms. Cummings mentioned, we used a greater number of lines for one facilities-based carrier as a result of additional information obtained from that carrier. In addition, we used MCImetro's line count reported to the Staff instead of the E911 listing count used by Verizon. Further, we adjusted Verizon Virginia's and Verizon South's retail lines somewhat downward to reflect the lines reported to the Staff as of December 31, 2006 in order to be consistent with the timing of the CLEC reported data.

Q28. ARE THERE ANY OTHER DIFFERENCES IN THE DATA USED BY THE STAFF?

A28. We did not include lines for any CLECs that had exited the market, and therefore had not reported any lines to the Staff as of December 31, 2006. Furthermore we did not specifically adjust total statewide CLEC lines to reflect that some proportion of those lines could be in another incumbent local exchange company's ("ILEC") serving territory. However, in a few instances, where it was apparent that the CLEC did not have lines in Verizon's service area (and no corresponding lines were reported by Verizon) those lines were not included in the Staff's database.

Q29. CAN YOU PROVIDE THE RESULTS FROM THE STAFF'S DATABASE?

A29. Yes. Highly Confidential Exhibit CH-3 presents the Staff's modified market share results on a total MSA and Region basis for both Verizon Virginia and Verizon South. Highly Confidential Exhibit CH-4 provides this information at the wire center level for each MSA and Region.

Q30. DOES THIS CONCLUDE YOUR TESTIMONY?

A30. Yes, it does.